



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

PHILIP R. SELLINGER
UNITED STATES ATTORNEY

John F. Basiak Jr.
Assistant United States Attorney
Deputy Chief, Civil Division

402 East State Street, Room 430
Trenton, NJ 08608
john.basiak@usdoj.gov

main: (609) 989-2190
direct: (609) 858-0309
fax: (609) 989-2275

May 22, 2024

Via ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Pergament & Cepeda LLP v. SBA*, Civil Action No. 23-cv-21632
Notice of Conditional Settlement and Request for 60-Day Order

Dear Judge Waldor:

This Office represents defendant U.S. Small Business Administration in the above-referenced matter. We write with the consent of Plaintiffs' counsel to inform the Court that the parties have reached a preliminary settlement subject to finalizing the terms of a settlement agreement and Plaintiffs' reorganization of their current business entity, among other conditions.

As the parties work toward finalizing this settlement, and to avoid unnecessary litigation expenses or judicial resources, we respectfully request that the Court issue a "60-day order" administratively terminating this case without prejudice under Local Civil Rule 41.1(b).

If this proposal is acceptable to the Court, we respectfully request that Your Honor "so order" this letter and have the clerk file it on the docket. Thank you very much for your time and consideration of this matter.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ John F. Basiak Jr. _____
JOHN F. BASIAK JR.
TASHA M. BRADT
Assistant United States Attorneys
Attorneys for the SBA

cc: Avi Frisch (counsel for Plaintiffs)